

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

SUSAN C. LAURITSEN,	)	
	)	
Plaintiff,	)	
	)	Case No. 4:22-cv-01073-JMB
v.	)	
	)	JURY TRIAL DEMANDED
JANE DOE and	)	
STATE FARM MUTUAL AUTOMOBILE	)	
INSURANCE COMPANY,	)	
	)	
Defendants.	)	

**DEFENDANT STATE FARM'S STATEMENT OF UNDISPUTED FACTS**

Comes Now Defendant State Farm, by and through its attorneys, and for its statement of facts about which there is no genuine dispute states as follows:

1. Plaintiff was operating her Vespa scooter on Clayton Rd. in Forest Park near the driveway entrance to the St. Louis Metropolitan Police Mounted Patrol Stables at the time of her accident. (Petition par. 5).
2. Plaintiff was found by Officer Paula Brandt, who Plaintiff told that she could not recall what happened to cause her crash. (Ex. 1, Police Report).
3. During her examination under oath, Plaintiff testified the driveway was located to her left. (Ex. 2, EUO of Susan Lauritsen, p. 17, ln. 25 through p. 18, ln. 2).
4. Plaintiff saw headlights coming out of the driveway at a high rate of speed. (Ex. 2, p. 15, ln. 21 through p. 16 ln. 3).
5. Plaintiff did not know how far away the headlights were from her, but guessed they were 15 feet away. (Ex. 2, p. 16, ln. 15-21).
6. Plaintiff believed the vehicle had entered onto Clayton Rd., but did not know how far into the roadway that vehicle traveled. (Ex. 2, p. 19, ln. 18-25 and p. 20, ln. 13-16).

7. The vehicle leaving the driveway did not strike Plaintiff. (Ex. 2, p. 20 ln. 1-2).
8. Plaintiff does not recall making any type of maneuver to avoid the vehicle leaving the driveway. (Ex. 2, p. 21, ln. 12-14).
9. Plaintiff has no memory of whether or not she applied her brakes. (Ex. 2, p. 24 ln. 9-14).
10. Plaintiff has no memory of her moped striking the curb. (Ex. 2, p. 24, ln. 15-19).
11. There are no other witnesses to the accident. (Ex. 2, p. 24 ln. 23-25).

**/s/ James A. Wilke**  
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I hereby certify that on December 16, 2022 the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

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**/s/ James A. Wilke**